

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
PLANO DIVISION

§
CONSTANCE SWANSTON and §
WOMEN'S ELEVATED SOBER LIVING §
LLC. and SHANNON JONES §
§
Plaintiffs, §
§
v. § CASE NO. 4:19-CV-00412-ALM
§
CITY OF PLANO, TEXAS and §
CITY OF PLANO BOARD §
OF ADJUSTMENT §
§
Defendants §

**PLAINTIFFS' UNOPPOSED MOTION TO OFFER TESTIMONY
BY CONTEMPORANEOUS TRANSMISSION**

Constance Swanston, Elevated Sober Living, LLC and Shannon Jones ("Plaintiffs") file this Unopposed Motion to Offer Testimony by Contemporaneous Transmission as follows:

"For good cause in compelling circumstances and with appropriate safeguards, the court may permit testimony in open court by contemporaneous transmission from a different location."

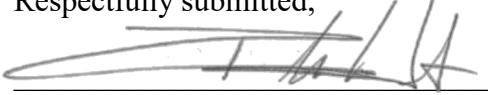
Fed. R. Civ. P. 43 (a).

Plaintiffs' witness, T.H., wishes to appear remotely because she has a five (5) month old infant and has been unable to find childcare.

Plaintiffs respectfully request that T.H. be permitted to testify via contemporaneous electronic transmission. Plaintiffs' counsel will coordinate with Court staff to implement the Court's preferred method of testimony with the appropriate safeguards recommended by the Court.

DATED: February 7, 2021

Respectfully submitted,


Richard M. Hunt
Texas State Bar No. 10288700
rhunt@hunthuey.com
Jeanne M. Huey
Texas State Bar No. 24004636
jhuey@hunthuey.com

HUNT HUEY PLLC
3333 Lee Parkway, Suite 600
Dallas, Texas 75219
Telephone: (214) 641-9182
Facsimile: (214) 279-6124

ATTORNEYS FOR SWANSTON AND
ELEVATED

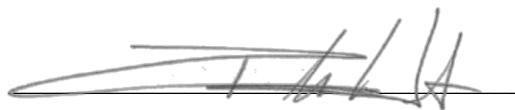
CERTIFICATE OF CONFERENCE

I certify that on February 7, 2021 I conferred with counsel for the Defendants that that
Defendants are not opposed to the relief requested in this Motion.


Richard M. Hunt

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing instrument was served on all parties through their respective counsel of record in accordance with Rule 5 of the Federal Rules of Civil Procedure on February 7, 2021.



Richard M. Hunt